REMARKS:

This paper is herewith filed in response to the Examiner's final Office Action mailed on March 17, 2010 for the above-captioned U.S. Patent Application. This office action is a rejection of claims 1-29 of the application.

More specifically, the Examiner has rejected claims 1-2 and 12-29 under 35 USC 103(a) as being unpatentable over Jaeger (US6883145) in view of Astala (US6,590,568); rejected claims 3-6 under 35 USC 103(a) as being unpatentable over Jaeger in view of Astala and further in view of Hawkins (US6,781,575); and rejected claims 8-11 under 35 USC 103(a) as being unpatentable over Jaeger in view of Astala and further in view of Leavitt (US20020085037). The Applicants respectfully traverse the rejections.

Claims 1, 13-6, 8-11, 13-16, 18-21, and 23-29 have been amended. Support for the amendments can be found at least in page 6, lines 9-13; page 9, line 23 to page 10 line 18; and page 11, lines 3-16, and Figure 4 of the Application. No new matter is added.

Although the Applicants do not expressly or impliedly agree with the rejections, the Applicants submit that in order to facilitate the prosecution of this patent application towards allowance each of the independent claims 1, 13, 19, and 23 have been amended in a somewhat similar fashion. For example, claim 1 now recites in part that:

Claim 1 as amended recites:

> "A method, comprising: selecting, with a user interface of an electronic apparatus, a first shortcut key located at a selecting position on a display of the electronic apparatus; determining that the first shortcut key was deselected and a deselecting position on the display where the first shortcut key was deselected; and based on the deselecting position, executing a function of at least three predefined functions, the three predefined functions comprising: executing a function attached to the first shortcut key if the deselected position and the

selected position are the same, cancelling the selection of the first shortcut key if the deselected position is on a portion of the display which is not defined to act as a shortcut key; and for the case that the deselected position is on a second shortcut key located on the display of the electronic apparatus then: shifting, in one action, the first shortcut key with its attached content and functionality to become the content and functionality of the second shortcut key, and shifting, in the one action, the second shortcut key with its attached content and functionality to become the content and functionality of the first shortcut key, wherein if no content and functionality is attached to the second shortcut key before the shifting then no content and functionality will be attached to the first shortcut key after the shifting"

The Applicants submit that none of the references cited can be seen to disclose or suggest at least where claim 1 recites in part "determining that the first shortcut key was deselected and a deselecting position on the display where the first shortcut key was deselected; and based on the deselecting position, executing a function of at least three predefined functions."

Jaeger

The Applicants note that Jaeger relates to a hand drawn interface which uses arrows to carry out transactions between, from, and among on-screen objects (col. 1, lines 27-29). In order to support the rejection of claim 1 the Examiner cites where Jaeger discloses an operation resulting from a hand drawn "specialty arrow" used to exchange or swap one or more aspects of two different screen objects (col. 15, lines 54-55 and col. 16, lines 5-20).

The Applicants submit that Jaeger does not disclose or suggest at least where claim 1 relates to determining that the first shortcut key was deselected and a deselecting position on the display where the first shortcut key was deselected and based on the deselecting position, executing a function of at least three predefined functions.

According to Jaeger:

"The arrow logics system provides different techniques for assigning arrow colors to particular transactions, in order to accommodate different amounts of flexibility and complexity according to how much each individual user can

manage, according to his or her level of experience. The following ways of assigning colors start with the simplest way to utilize arrow Exchange logics and become increasingly more flexible and complicated. (a) Lower level user: Assign one arrow color per arrow logic category [...] (b) Power User: Assign variants of one color for various arrow transactions that are included in each arrow transaction category [...] (c) Higher Power User: Assign variants of one color for various arrow transactions that are included in each arrow transaction category, plus variants of line styles for each arrow transaction category," (col. 5, lines 24-60).

The Applicants submit that according to Jaeger an arrow is assigned a color by a user in order for the user to define the particular transaction for the arrow. The Applicants submit that there is no selecting or deselecting of shortcut keys in Jaeger. Rather, in Jaeger, arrows of various colors are drawn between objects on a screen.

Further, the Applicants note that Jaeger discloses that "The software system carries out recognition of each arrow and also determines which on-screen object(s) is within a default distance to the head, tail, and line of each arrow to associate the transaction conveyed by the arrow with the appropriate on-screen object(s)," (col. 1, lines 33-38). However, the Applicants submit that determining which on-screen object is within a default distance to the head, tail, and line of each arrow in Jaeger is clearly distinguishable from where claim 1 relates to determining that a first shortcut key was deselected and determining a position on a display where the first shortcut key was deselected.

In addition, the Applicants note that Jaegar discloses:

"The following is a partial list of transactions that may be carried out using arrow logics. (a) Copy/Replace or Copy/Replace/Delete from screen (b) Place Inside (c) Send the signal or contents to (d) Change to (e) Specialty Arrows which are determined by context, not necessarily by color. (f) Insert an action or function in the stem of an arrow. (g) Rotational direction for a knob (h) Apply the control of a device to one or more objects, devices or text. (i) Reorder or redirect a signal path among screen objects. (j) Create multiple copies of, and place these copies on the screen display. k) Swap Utilizing Different Colors for Different Arrow Transactions," (col. 5, lines 6-23).

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The Applicants submit that these transactions of Jaeger which are <u>carried out using arrow logics</u> do not disclose or suggest predefined functions as recited in claim 1. For example, the Applicants submit that there is not disclosed in Jaegar a transaction which discloses or suggests at least where claim 1 recites in part:

> "<u>executing a function attached to the first shortcut key if the deselected position and the selected position are the same,</u>" and

> "<u>cancelling the selection of the first shortcut key if the deselected position is on a portion of the display which is not defined to act as a shortcut key</u>"

Further, the Applicants contend that the swap operation of Jaeger, as cited in the rejection, does not disclose or suggest where claim 1 recites in part:

> "<u>shifting, in one action,</u> the first shortcut key with its attached content and functionality to become the content and functionality of the second shortcut key, and <u>shifting, in the one action,</u> the second shortcut key with its attached content and functionality to become the content and functionality of the first shortcut key"

Although the Applicants do not agree that the swap operation of Jaeger discloses or suggests where claim 1 relates to shifting a first shortcut key with its attached content and functionality to become the content and functionality of a second shortcut key in the second position on the display of the electronic apparatus, and visa versa, the Applicants contend that the swap of the action of the objects in Jaeger is clearly not performed in one action. The Applicants note that, with regards to the swap action, Jaeger discloses "Once recognized, the drawn arrow is replaced by a display arrow (FIG. 40B) <u>that can flicker until touched to confirm the transaction</u>," (emphasis added), (col. 15, line 67 to col. 16, line 2). The Applicants submit that, as indicated in Jaeger, there are at least the intermediary operations of replacing the drawn arrow with a flickering the arrow and a confirmation of the transaction by touching the flickering arrow before any swap operation of Jaeger can occur. Clearly, Jaeger does not relate to performing a swap operation in one action.

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Furthermore, the Applicants submit that there is not disclosed or suggested in Jaeger that an action object of Jaeger would consequently have no content and functionality after a swap in Jaeger. The Applicants submit that for at least this reason Jaeger does not disclose or suggest at least where claim 1 recites in part "wherein if no content and functionality is attached to the second shortcut key before the shifting then no content and functionality will be attached to the first shortcut key after the shifting."

The Applicants contend that, for at least the reasons stated above, Jaeger does not disclose or suggest at least where claim 1 recites in part:

> "determining that the first shortcut key was deselected and a deselecting position on the display where the first shortcut key was deselected; and based on the deselecting position, executing a function of at least three predefined functions, the three predefined functions comprising: executing a function attached to the first shortcut key if the deselected position and the selected position are the same, cancelling the selection of the first shortcut key if the deselected position is on a portion of the display which is not defined to act as a shortcut key; and for the case that the deselected position is on a second shortcut key located on the display of the electronic apparatus then: shifting, in one action, the first shortcut key with its attached content and functionality to become the content and functionality of the second shortcut key, and shifting, in the one action, the second shortcut key with its attached content and functionality to become the content and functionality of the first shortcut key, wherein if no content and functionality is attached to the second shortcut key before the shifting then no content and functionality will be attached to the first shortcut key after the shifting"

Astala

The Applicants submit that Astala appears to be either to replacing a file with another file having the same name or to add a file to another file or directory. This process of Astala is depicted in Figs 6b–6c as cited in the rejection. The Applicants submit that notably this depicted process appears to be the only described example of a drag and drop method of Astala.

The Applicants contend that Astala does not overcome the shortfalls of Jaeger, as stated above.

Hawkins

The Applicants note that Hawkins discloses that on the handheld computer of Hawkins a "stylus can also be used to perform "drag and drop" operations in the fashion known in the use of a computer mouse," (col. 4, lines 49-51). However, the Applicants submit that Hawkins does not overcome the shortfalls of Jaeger and Astala, as stated above.

Leavitt

The Applicants submit that Leavitt discloses operations related to dragging and dropping applications and assigning command to buttons (paragraph [0016]). The Applicants submit that Leavitt does not overcome the shortfalls of the references, as stated above.

The Applicants submit that, for at least the reasons already stated, even if the references were combined, which is not agreed to as proper, the proposed combination would still fail to disclose or suggest claim 1.

The Applicants contend that, for at least the reasons stated, the rejection of claim 1 is improper and the rejection should be removed.

In addition, the Applicants submit that, for similar reasons, the foregoing amendments to the independent claims 13, 19, and 23 also place these claims in condition for allowance in view of the references cited. Therefore the Examiner is requested to remove the rejections and allow these claims.

Further, for at least the reasons that claims 2-6 and 8-12, claims 14-16 and 18, claims 20-22, and claims 24-29 are dependent upon independent claims 1, 13, 19 and 23, respectively, the rejections of these claims should be removed.

Based on the above explanations and arguments, it is clear that the references cited cannot be seen to disclose or suggest claims 1-6, 8-16, and 18-29. The Examiner is respectfully requested to reconsider and remove the rejections of claims 1-6, 8-16, and 18-29 to allow all of the pending claims 1-6, 8-16, and 18-29 as now presented for examination.

For all of the foregoing reasons, it is respectfully submitted that all of the claims now present in the application are clearly novel and patentable over the prior art of record. Should any unresolved issue remain, the Examiner is invited to call Applicants' attorney at the telephone number indicated below.

Respectfully submitted:

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